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December 15, 2020

Via ECF

Honorable Michael A. Hammer, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, MLK 2C
Newark, NJ 07101

Re: Ronnie L. Faison v. Receivables Performance Management LLC, et al.
Case No.: 2:19-cv-08590-MCA-MAH
Our File No.: 19-009

Dear Judge Hammer:

This firm, along with co-counsel, represents the Plaintiff Ronnie L. Faison in the above-referenced matter. The parties write to respectfully request an extension of the deadlines for the reasons outlined below.

Written discovery is underway and both parties have provided responses, however, Defendant's discovery responses were not received until November 18, 2020 due to personal reasons for Defendant's counsel. Plaintiff is currently reviewing and analyzing the same but require additional time. To that end, the parties jointly and respectfully request an extension of the deadlines from the Pretrial Scheduling Order (ECF No. 22)¹.

- Deadline to bring discovery disputes to the Court's attention to January 14, 2021;
- Deadline for depositions of fact witnesses and individuals who will give lay opinion testimony to March 31, 2021;
- Fact Discovery Deadline to March 31, 2021;
- Deadline for all affirmative expert reports to April 28, 2021;
- Deadline for all responding expert reports to May 29, 2021; and
- Deadline for all expert disco, including the completion of depositions to June 27, 2021.

The parties thank the Court for its consideration and courtesies in this matter.

¹ The parties acknowledge and respect Your Honor's footnote stating that an application for extension of the fact discovery deadline will be closely scrutinized, however, the parties respectfully submit this extension request due to Defendant's counsel having had obligations for a family member with medical issues and in consideration of the upcoming holidays.

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Very truly yours,

s/Yongmoon Kim

Yongmoon Kim

KIM LAW FIRM LLC

YK/jy

cc: All Counsel of Record (*via ECF*)